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5 Attorneys for all Defendants except Prasad Lakireddy

6  
7  
8 IN THE UNITED STATES DISTRICT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 JANE DOE I; JANE DOE II; LAKSHMI  
and JARMANTI PRATTIPATI as Parents  
11 and Successors in Interest of CHANTI  
JYOTSNA DEVI PRATTIPATTI; JANE  
12 DOE III; JANE DOE IV; JANE DOE V;  
DANE DOE VI; JANE DOE VII; JANE  
13 DOE VIII; SREEKANTH KOLLIPARA;  
and All Others Similarly Situated

14 Plaintiffs,

15 vs.

16 LAKIREDDY BALI REDDY, an  
individual; VIJAY KUMAR  
17 LAKIREDDY, an individual; PRASAD  
LAKIREDDY, an individual;  
18 JAYAPRAKASH REDDY LAKIREDDY,  
an individual; VENKATESWARA  
19 REDDY LAKIREDDY, an individual; and  
the businesses they controlled and/or  
20 operated, including PASAND MADRAS  
CUISINE, a California corporation;  
21 PASAND, INC., a California corporation;  
LAKIREDDY INVESTMENT CO., a  
22 California limited liability corporation; L.B.  
REDDY ESTATE CO., a California limited  
23 liability company; JAY CONSTRUCTION,  
a California sole proprietorship; ACTIVE  
24 TECH SOLUTIONS, a California  
corporation; VANI COMPUTER  
25 SOLUTIONS, a California limited liability  
corporation; LAKIREDDY BALI REDDY  
26 d/b/a REDDY REALTY CO., a California  
sole proprietorship; and ROES 1 through  
27 100, inclusive,

28 Defendants.

Case No. C-02-5570-WHA

**RESPONSES TO PLAINTIFF JANE DOE  
I'S INTERROGATORIES TO  
DEFENDANT LAKIREDDY  
INVESTMENT CO., SET ONE**

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PROPOUNDING PARTY: PLAINTIFF JANE DOE I

RESPONDING PARTY: LAKIREDDY INVESTMENT CO.

SET NUMBER: ONE

INTERROGATORY RESPONSES

1. State YOUR full name and the address of YOUR principal place of business.

**RESPONSE:** Lakireddy Investment Company LLC, 2278 Shattuck Ave. Berkeley, California 94704

2. State all other names that YOU have used (including fictitious business names) between January 1, 1982 and the present.

**RESPONSE:** None

3. State YOUR legal status (i.e. corporation, partnership, joint venture, unincorporated association, etc.) and the place and date YOU were formed.

**RESPONSE:** Lakireddy Investment is a Partnership, Investigation is still continuing into the date and place of formation, when the answer is determined a supplementary response will be filed.

4. IDENTIFY every person and ENTITY that has an ownership interest in YOU and state the size of that interest (i.e. 100 percent, 25 percent, etc.) (If there have been any changes in ownership since January 1, 1990, describe each change in ownership.)

**RESPONSE:** Lakireddy Bali Reddy, Vijay Kumar Lakireddy, Jayaprakash Reddy Lakireddy, Prasad Lakireddy

5. IDENTIFY YOUR officers and directors.

**RESPONSE:** None

6. IDENTIFY YOUR ORGANIZATIONAL DOCUMENTS.

**RESPONSE:** The only documents are a Partnership Agreement that will be provided on the day of first production.

7. IDENTIFY every ENTITY in which you held, directly or indirectly, a 10 percent or greater ownership interest at any time between January 1, 1990 and the present.

**RESPONSE:** None

8. Did YOU ever EMPLOY any of the PLAINTIFFS to perform work in California?

**RESPONSE:** No

9. If YOUR answer to Interrogatory No. 8 is yes, list the PLAINTIFFS whom you EMPLOYED to perform work in California and provide their respective dates of EMPLOYMENT.

**RESPONSE:** N/A

10. For each of the PLAINTIFFS listed in response to Interrogatory No.9, IDENTIFY all DOCUMENTS that report the number of hours worked by the PLAINTIFF as YOUR EMPLOYEE in California and/or the WAGES paid to PLAINTIFF for such work.

**RESPONSE:** N/A

11. For each of the PLAINTIFFS listed in response to Interrogatory No.9, state whether YOU ever EMPLOYED the PLAINTIFF to perform work in California OFF THE BOOKS.

**RESPONSE:** N/A

12. For each of the PLAINTIFFS listed in response to Interrogatory No.9, provide a complete itemization of all money and other things of value that were provided to the PLAINTIFF (or his or her family) as full or partial compensation for the PLAINTIFF'S labor as

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1 YOUR employee in California and that are not reported in the records YOU identified in  
2 response to Interrogatory No.10.

3 **RESPONSE:** N/A  
4

5 13. For each of the PLAINTIFFS listed in response to Interrogatory No.9, provide a  
6 complete listing of the hours worked by the PLAINTIFF as YOUR employee in California that  
7 are not reported in the records YOU identified in response to Interrogatory No.10.

8 **RESPONSE:** N/A  
9

10 14. IDENTIFY every person (other than the PLAINTIFFS) whom YOU  
11 EMPLOYED to perform work in California at any time between January 1, 1990 and the  
12 present and provide their respective dates of EMPLOYMENT.

13 **RESPONSE:** None  
14

15 15. For each person identified in response to Interrogatory No. 14, state whether  
16 YOU ever EMPLOYED the person to perform work in California OFF THE BOOKS.

17 **RESPONSE:** N/A  
18

19 16. For each of the PLAINTIFFS, IDENTIFY every person and ENTITY that  
20 EMPLOYED the PLAINTIFF to perform work in California prior to January 1,2000 and  
21 provide the dates of EMPLOYMENT.

22 **RESPONSE:**

- 23 1. DOE I often socialized at restaurant defendant Pasand Madras Cuisine, but never  
24 was employed by any defendant.
- 25 2. DOE II often socialized at restaurant defendant Pasand Madras Cuisine, but never  
26 was employed by any defendant.
- 27 3. DOE III Worked for various restaurants owned by defendants including Pasand  
28 Madras Cuisine, as well as being employed by Jay Construction from 1995until

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the end of 1999.

4. DOE IV Worked for Jay Construction from 1995 until 1999. DOE IV was paid by Active Tech Solutions, but never performed any actual work for Active Tech Solutions.
5. DOE V Worked for Jay Construction from 1995 until 1999.
6. DOE VI Worked for Jay Construction from 1995 until 1999.
7. DOE VII was never employed by a defendant.
8. DOE VIII worked for Pasand Madras Cuisine from September of 1999 until January of 2000.
9. SREEKANTH KOLLIPARA came to the United States in December of 1999 to work for Active Tech Solutions, but never worked for Active Tech Solutions.
10. CHANTI JYOSTHNA DEVI PRATTIPATI often socialized at restaurant Pasand Madras Cuisine, but never was employed by any defendant.

Dated: March 17, 2013

BISHOP, BARRY, HOWE, HANEY & RYDER

By: 

MICHAEL W BOLECHOWSKI  
MARK C. RASKOFF

## VERIFICATION

## RESPONSES TO PLAINTIFF'S INTERROGATORIES TO LAKIREDDY INVESTMENT CO.

- ☐ I, Lakireddy Bali Reddy, am a party to this action; the attached document is true of my own knowledge, except as to the matters that are stated there upon my information and belief or as to matters within the knowledge of my counsel of record or their agents, and as to those matters I believe them to be true.
- ☒ I am an officer or agent of the party providing this Verification, and am authorized to make this Verification for and on its behalf, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the general partners of the partnership providing this Verification, and am authorized to make this Verification for and on behalf of the partnership, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the attorneys for the party required to provide this verified Answer; I make this Verification on behalf of said party who is absent from the County of Alameda, California, where I have my office; I have read the attached Answer and know its contents; I am informed and believe and on that ground allege that the matters stated in it are true.
- ☐ I am one of the attorneys for the party required to provide this verified response. I make this Verification for the reason checked below:
- ☐ because the facts alleged in the attached document are within my own personal knowledge, and are not within the knowledge of the responding party or any of its agents or employees;
- ☐ because the responding party's whereabouts are unknown to me, said party has failed to communicate with me concerning the subject litigation, and it is impossible, impractical or futile to secure said party's Verification to the attached document;

The matters stated in the attached document are true of my own knowledge, except as to any matters stated therein upon information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on 3-13-, 2003 at LOMPOC, California.

  
Lakireddy Bali Reddy

MICHAEL W. BOLECHOWSKI (SBN: 118725)  
MARK C. RASKOFF (SBN: 72330)  
DAVID L. HART (SBN: 219517)  
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Attorneys for all Defendants except Prasad Lakireddy

IN THE UNITED STATES DISTRICT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JANE DOE I; et al.,  
Plaintiffs,

vs.

LAKIREDDY BALI REDDY, et al.,  
Defendants.

Case No. C-02-5570-WHA

**SUPPLEMENTAL RESPONSES TO  
PLAINTIFF JANE DOE I'S  
INTERROGATORIES TO DEFENDANT  
LAKIREDDY INVESTMENT CO., SET  
ONE**

**AMENDED**

PROPOUNDING PARTY: PLAINTIFF JANE DOE I

RESPONDING PARTY: LAKIREDDY INVESTMENT CO.

SET NUMBER: ONE

SUPPLEMENTAL INTERROGATORY RESPONSES

3. State YOUR legal status (i.e. corporation, partnership, joint venture, unincorporated association, etc.) and the place and date YOU were formed.

**RESPONSE:**

Responsive party is a Limited Liability Company. Responding party has made a diligent search but is unable to provide further information.

6. IDENTIFY YOUR ORGANIZATIONAL DOCUMENTS.

**RESPONSE:** Defendants believe a partnership agreement exists, but are currently unable to locate it. Defendants have made a diligent search of documents they have and will continue to



1 make available to plaintiffs. Responsive party has produced all of its tax returns identifying it as  
 2 a Limited Liability Company. Responding party is still unable to locate ORGANIZATIONAL  
 3 DOCUMENTS.

4  
 5 16. For each of the PLAINTIFFS, IDENTIFY every person and ENTITY that  
 6 EMPLOYED the PLAINTIFF to perform work in California prior to January 1, 2000 and  
 7 provide the dates of EMPLOYMENT.

8 **RESPONSE:**

- 9 1. DOE I often socialized at restaurant Pasand Madras Cuisine, but never was  
 10 employed by any defendant. Defendants don't know anyone else that employed  
 11 this plaintiff.
- 12 2. DOE II often socialized at restaurant Pasand Madras Cuisine, but never was  
 13 employed by any defendant. Defendants don't know anyone else that employed  
 14 this plaintiff.
- 15 3. DOE III worked for various restaurants owned by Defendants on an "as needed  
 16 basis" and was employed by Jay Construction from 1995 until the end of 1999 as  
 17 well n an "as needed basis". Defendants can not be more specific with regard to  
 18 the hours Doe III worked. Defendants did pay for several trips to India for Doe III  
 19 for months. During the vacations to India Doe III performed no work for  
 20 Defendants. Defendants don't know anyone else that employed this plaintiff.
- 21 4. DOE IV worked for Jay Construction from 1995 until 1999. Doe IV was paid by  
 22 Active Tech Solutions but never performed any actual work for Active Tech  
 23 Solutions. Defendants have searched records and are unable to determine the  
 24 hours this plaintiff worked per week. Defendants paid for Doe IV to take trips  
 25 back to India for several months at a time. Defendants believe Doe IV worked at  
 26 Subway Sandwiches in Berkeley. Defendants have made a diligent search, but are  
 27 unable to give more specific information. Defendants don't know anyone else that  
 28 employed this plaintiff.



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5. DOE V worked for Jay Construction from 1995 until 1999. Defendants paid for Doe V to take trips back to India for several months at a time. Defendants have searched records and are unable to determine the hours the plaintiff worked per week. Defendants don't know anyone else that employed this plaintiff.
6. DOE VI worked for Jay Construction from 1995 until 1999. Defendants paid for Doe VI to take trips back to India for several months at a time. Defendants have made a diligent search of the records but are unable to give specific information on the hours this plaintiff worked. Defendants don't know anyone else that employed this plaintiff.
7. DOE VII was never employed by a Defendant. Defendants don't know anyone else that employed this plaintiff.
8. DOE VIII worked for Pasand Madras Cuisine from September of 1999 until January of 2000. Defendants can not be more specific concerning the hours she worked. Defendants are not aware of Doe VIII's other employers.
9. SREEKANTH KOLLIPARA came to the United States in December of 1999 to work for Active Tech Solutions but never worked for Active Tech Solutions. Defendants don't know anyone else that employed this plaintiff.
10. CHANTIYOSTHNA DEVI PRATTIPATI often socialized at restaurant Pasand Madras Cuisine, but never was employed by any defendant. Defendants don't know anyone else that employed this plaintiff.

Dated: 7-28-03

BISHOP, BARRY, HOWE, HANEY & RYDER

By: 

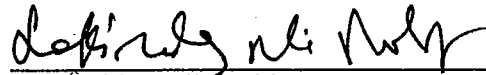
MICHAEL W BOLECHOWSKI  
 MARK C. RASKOFF  
 DAVID L. HART

**VERIFICATION  
RESPONSES TO PLAINTIFF'S DISCOVERY**

- ☐ I, Lakireddy Bali Reddy am an owner of the Defendant and the foregoing answers are based upon my investigation into the facts concerning each specific request.
- ☐ I am an officer or agent of the party providing this Verification, and am authorized to make this Verification for and on its behalf, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the general partners of the partnership providing this Verification, and am authorized to make this Verification for and on behalf of the partnership, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the attorneys for the party required to provide this verified Answer; I make this Verification on behalf of said party who is absent from the County of Alameda, California, where I have my office; I have read the attached Answer and know its contents; I am informed and believe and on that ground allege that the matters stated in it are true.
- ☐ I am one of the attorneys for the party required to provide this verified response. I make this Verification for the reason checked below:
- ☐ because the facts alleged in the attached document are within my own personal knowledge, and are not within the knowledge of the responding party or any of its agents or employees;
- ☐ because the responding party's whereabouts are unknown to me, said party has failed to communicate with me concerning the subject litigation, and it is impossible, impractical or futile to secure said party's Verification to the attached document;

The matters stated in the attached document are true of my own knowledge, except as to any matters stated therein upon information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on JULY 19, 2003 at LOMPA, California.

  
Lakireddy Bali Reddy